

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TOMMY LEWIS,

Defendant.

No. 5:23-cr-00090-JGB

I N F O R M A T I O N

[18 U.S.C. § 1344(2): Bank Fraud]

The United States Attorney charges:

[18 U.S.C. § 1344(2)]

A. THE SCHEME TO DEFRAUD

1. Beginning in or around March 2020, and continuing through in or around September 2020, in San Bernardino, Riverside, and Los Angeles Counties, within the Central District of California, and elsewhere, defendant TOMMY LEWIS, knowingly and with the intent to defraud, devised, participated in, and executed a scheme to obtain monies and funds owned by and in the custody and control of Bank of America (BoFA) by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

B. MANNER AND MEANS OF THE FRAUDULENT SCHEME

2. The scheme to defraud operated, in substance, in the

1 following manner:

2 a. Defendant LEWIS would obtain stolen Personally  
3 Identifiable Information (PII) of other people, such as social  
4 security numbers and dates of birth, .

5 b. Defendant LEWIS would use that stolen PII to file  
6 applications in those other identities for unemployment insurance  
7 benefits with the California Employment Development Department (EDD).

8 c. On those applications, defendant LEWIS would input  
9 false information regarding employment and California residency.

10 d. On those applications, defendant LEWIS would use his  
11 home address or a relative's address for the mailing address.

12 e. Based upon those fraudulent applications, California  
13 EDD would cause BofA to mail debit cards and other correspondence to  
14 the addresses listed on the applications.

15 f. Defendant LEWIS would receive those EDD debit cards in  
16 the names of others and use them to withdraw a total of more than  
17 \$140,000 cash from ATMs.

18 g. Defendant LEWIS would use those fraudulently obtained  
19 proceeds for personal expenditures, including purchasing a red Tesla  
20 for himself.

21 C. THE EXECUTION OF THE SCHEME TO DEFRAUD

22 3. On or about August 27, 2020, within the Central District of  
23 California, defendant LEWIS used the EDD debit card in the name of


24 ///

25 ///

26 ///

1 T.C. to withdraw \$1,000 cash from a BofA ATM in Grand Terrace,  
2 California, which constituted an execution of the fraudulent scheme.

3 E. MARTIN ESTRADA  
4 United States Attorney

5   
6 MACK E. JENKINS  
7 Assistant United States Attorney  
8 Chief, Criminal Division

9 BENJAMIN R. BARRON  
10 Assistant United States Attorney  
11 Chief, Santa Ana Branch Office

12 BRADLEY E. MARRETT  
13 Assistant United States Attorney  
14 Deputy Chief, Santa Ana Branch  
15 Office

16 CHARLES E. PELL  
17 Assistant United States Attorney  
18 Santa Ana Branch Office  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28